

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

Permittee: The Amalgamated Sugar Company, LLC **Date Issued:** December 12, 2002
Location: Paul, Idaho **Date Expires:** December 12, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

8. EMISSION UNITS GROUP 7 - DRYING GRANULATOR (P-W1)

The following is a narrative description of the drying granulator, identified as emission point P-W1, regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates a drying granulator to dry wet sugar. The drying granulator was manufactured by TASC0 and installed prior to 1952. Emissions from the drying granulator are controlled by a dust box type scrubber.

Table 8.1 describes the devices used to control emissions from the drying granulator.

Table 8.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-W1	65 tons sugar per hour drying granulator (S-W1)	Scrubber (A -W1)

Table 8.2 contains a summary of requirements that apply generally to the drying granulator. Specific permit requirements are listed below Table 8.2.

Table 8.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 8.2, 8.3
8.1	PM	Process weight	IDAPA 58.01.01.702	8.2, 8.3

Permit Limits/Operating Requirements

8.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

8.2 The permittee shall at all times maintain in good working order and operate in accordance with the O&M manual, or as efficiently as practicable, the drying granulator and its scrubber. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

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Operations and Maintenance Manual

- 8.3 The permittee shall develop an initial O&M manual and submit it to the Department within one year of permit issuance. The O&M Manual is part of the terms and conditions of the permit.
- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
 - The O&M manual shall address the operation, maintenance, and repair of the drying granulator and its scrubber to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
 - The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
 - The O&M manual shall be maintained onsite and made available to Department representatives upon request.
 - Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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9. EMISSIONS UNITS GROUP 8 - COOLING GRANULATORS (P-W2, P-W3)

The following is a narrative description of the cooling granulators regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates two cooling granulators to cool hot sugar from the drying granulator. Each cooling granulator is rated at 65T/hr. Emissions from the cooling granulators are controlled by baghouses.

Table 9.1 describes the devices used to control emissions from the cooling granulators.

Table 9.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-W2	Cooling granulator No. 1 (S-W2)	Baghouses (A - W2)
P-W3	Cooling granulator No. 2 (S-W3)	Baghouses (A - W3)

The following table contains a summary of requirements that apply generally to the cooling granulators. Specific permit requirements are listed below Table 9.2.

Table 9.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Emissions Unit	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Cooling granulator No. 1 and cooling granulator No. 2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 9.3, 9.4
9.1, 9.2	Cooling granulator No. 1; Cooling granulator No. 2	PM	Process weight	IDAPA 58.01.01.701; IDAPA 58.01.01.702	9.3, 9.4

Permit Limits/Operating Requirements

9.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

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9.2 No person shall emit to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701 4/5/00]

9.3 The permittee shall at all times maintain in good working order and operate in accordance with the O&M manual, or as efficiently as practicable, the two cooling granulators and their associated baghouses. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Operations and Maintenance Manual

9.4 The permittee shall develop an initial O&M manual and submit it to the Department within one year of permit issuance. The O&M Manual is part of the terms and conditions of the permit.

- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
- The O&M manual shall address the operation, maintenance, and repair of the two cooling granulators and the associated baghouses to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on performance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.

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- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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10. EMISSIONS UNIT GROUP 9 - SUGAR HANDLING SYSTEM (P-W4, P-W5)

The following is a narrative description of the sugar handling system regulated in this Tier I operating permit. This description is for informational purposes only.

Particulate matter is emitted from process sugar handling and sugar handling bulk loading systems. Emissions are controlled by baghouses.

Table 10.1 describes the devices used to control emissions from the sugar handling system.

Table 10.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-W4	Process sugar-handling system with ventilation of 16,600 acfm to baghouses (Process S-W4)	Baghouses (A -W4)
P-W5	Bulk loadout sugar-handling system with ventilation of 17,000 acfm to baghouses (Bulk Loadout S-W5)	Baghouses (A -W5)

Table 10.2 contains a summary of requirements that apply generally to sugar handling. Specific permit requirements are listed below Table 10.2.

Table 10.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Emission Unit/Source	Parameter	Permit Limit/Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Baghouse vents	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 10.2, 10.3
10.1	Sugar-handling (Process)	PM	Process weight	IDAPA 58.01.01.702	10.2, 10.3
10.1	Sugar-handling (Bulk Loadout)	PM	Process weight	IDAPA 58.01.01.702	10.2, 10.3

Permit Limits/Operating Requirements

10.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

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- 10.2 The permittee shall at all times maintain the sugar-handling baghouses in good working order and operate in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Operations and Maintenance Manual

- 10.3 The permittee shall develop an initial O&M manual and submit it to the Department within one year of permit issuance. The O&M Manual is part of the terms and conditions of the permit.

- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
- The O&M manual shall address the operation, maintenance, and repair of the sugar-handling baghouses to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.
- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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The following is a narrative description of the lime kiln building material handling baghouses regulated in this Tier I operating permit. This description is for informational purposes only.

Particulate matter emissions from the lime kiln building material handling are controlled by four baghouses.

Table 11.1 describes the devices used to control emissions from the lime kiln building.

Table 11.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/ Source Identification	Emissions Unit(s) Identification	Emission Control Device
None identified	Lime kiln building material handling	Four baghouses

Table 11.2 contains a summary of requirements that apply generally to the four lime kiln building material handling baghouses. Specific permit requirements are listed below Table 11.2.

Table 11.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Emission Unit	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Each baghouse	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 11.2, 11.3
11.1	All four baghouses	PM	Process weight	IDAPA 58.01.01.702	11.2, 11.3

Permit Limits/Operating Requirements

11.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

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- 11.2 The permittee shall at all times maintain the baghouses in good working order and operate in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Operations and Maintenance Manual

- 11.3 The permittee shall develop an initial O&M manual and submit it to the Department within one year of permit issuance. The O&M Manual is part of the terms and conditions of the permit.

- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
- The O&M manual shall address the operation, maintenance, and repair of the baghouses to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.
- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9, and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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12. NON-APPLICABILITY DETERMINATION

- 12.1 The standards for fuel-burning equipment particulate matter, IDAPA 58.01.01.675 do not apply to pulp dryers, which are included under Section 4 of this permit, or lime kilns which are included under Section 6 of this permit.
- 12.2 The grain-loading standard (0.1 gr/dscf) in Section 1.1 of the existing Permit No. 1020-0001 dated January 1, 1984, does not apply to pulp dryers under Section 4 of this permit.
- 12.3 Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, does not currently apply to the B & W boiler.
- 12.4 Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, does not currently apply to the Erie City boiler.
- 12.5 Permit Conditions 2.1, 2.2, 3.1, 3.2, 3.3, 3.4, 4.1, 4.2, 4.3, and 4.4 of existing Permit No. 1020-0001, dated January 1, 1984, are no longer applicable because they pertain to the 1984 through 1986 campaign seasons which have been completed.

[IDAPA 58.01.01.325, 5/1/94]

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13. COMPLIANCE SCHEDULE

TASCO shall implement the following compliance schedule to assure compliance with the applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.01, et seq. The permittee shall obtain a combined facility-wide Tier II operating permit and PTC (hereafter referred to as the facility-wide permit) and a modified Tier I operating permit. The specific elements of the compliance schedule are summarized in Table 13.1 and specified in Permit Conditions 13.2 through 13.9.

Table 13.1 COMPLIANCE SCHEDULE

Permit Conditions	Milestone	Deadline	Documentation / Reporting
13.2	Submit complete facility-wide permit application to comply with IDAPA 58.01.01.400 through 410	180 days after issuance of the Tier I operating permit	Completeness letter from the Department
13.3	Concurrently submit complete application information to address the applicable PTC requirements in IDAPA 58.01.01.200 through 223 for those sources for which the permittee was required to, but did not obtain, a PTC	180 days after issuance of the Tier I operating permit	Completeness letter from the Department
13.4	Submit supplemental application information to address the applicable PTC requirements for any additional sources identified	Within 30 days of a request in writing by the Department during processing of the facility-wide permit	Completeness letter from the Department
13.7	Submit a request to modify the Tier I operating permit	30 days after the facility-wide permit application is found complete	Completeness letter from the Department
13.8	Submit quarterly progress reports	January 1, April 1, July 1, and October 1 of each year	

13.1 The Department identified the following sources as sources that are not in compliance because of failure to obtain a permit to construct prior to construction or modification:

- The third, fourth, and fifth evaporators replaced prior to the 2001 beet campaign
- The sixth evaporator constructed in 2002

The permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

13.2 TASCO shall submit a complete permit application and all additional information requested by the Department for issuance of a facility-wide Tier II operating permit within 180 days of issuance of this Tier I operating permit. The application shall address the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410.

[IDAPA 58.01.01.322.10, 4/5/00]

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- 13.3 In addition to the requirements for Tier II operating permits, the facility-wide permit application shall include all of the applicable information and address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through IDAPA 58.01.01.223 for the construction and/or modification of sources for which the permittee was required to, but did not obtain, a PTC. The Department has identified the sources listed in Permit Condition 13.1 as sources that failed to obtain a permit prior to construction or modification.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.4 If through the development of the facility-wide permit, it is determined that the facility should have obtained a PTC or a PTC modification for any other source or sources at the facility, the permittee shall submit a supplemental application that addresses the applicable requirements for PTCs within 30 days of receiving written notification from the Department.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.5 The application submittal deadlines set forth in the compliance schedule may be extended if the permittee clearly demonstrates that additional time is needed to collect new data for submittal of a complete application. Extension requests, with complete information to justify the request, must be submitted in writing to the Department no later than the midpoint of the milestone timeline. The deadlines may be extended for up to one year through written authorization from the Department.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.6 Upon receipt of a complete application, the Department will draft a single proposed facility-wide permit for the facility. The permit will contain all of the terms and conditions necessary to comply with the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410. The permit will clearly identify the origin and basis for each term and condition. The procedures for issuing a PTC under IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II operating permit under IDAPA 58.01.01.404.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.7 TASCO shall request a modification to their Tier I operating permit within 30 days after the combined facility-wide Tier II operating permit and PTC application is determined complete by the Department. The Tier I operating permit shall be modified to incorporate all applicable requirements of the facility-wide permit and shall be issued concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I permit in IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.8 Until such time that a modified Tier I operating permit is issued pursuant to Permit Condition 13.7, TASCO shall submit a progress report each calendar quarter to the Department stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, and an explanation of why any dates were not or will not be met and a detailed description of any preventative or corrective measures undertaken by the permittee.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.9 This schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
[IDAPA 58.01.01.322.10, 4/5/00]

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14. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

- 14.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

- 14.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

- 14.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

- 14.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.15.c 5/1/94; IDAPA 58.01.01.386, 3/19/99;
40 CFR 70.7(f)(1)(2); 40 CFR 70.6(a)(6)(iii)]

- 14.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

- 14.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

- 14.7 The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00;
40 CFR 70.6(a)(6)(v)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

Permittee: The Amalgamated Sugar Company, LLC **Date Issued:** December 12, 2002
Location: Paul, Idaho **Date Expires:** December 12, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 14.8 Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

- 14.9 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

- 14.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 4/5/00;
40 CFR 70.4(b)(12)(14)(15); 40 CFR 70.7(d)(e)]

- 14.11 Changes not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 USC Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94;
40 CFR 70.4(b)(14)(15)]

Federal and State Enforceability

- 14.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1)(2)]

- 14.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements, or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

Permittee: The Amalgamated Sugar Company, LLC
Location: Paul, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Inspection and Entry

- 14.14 Upon presentation of credentials, the permittee shall allow the Department, or an authorized representative of the Department, to do the following:

Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit; inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

- 14.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

- 14.16 The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

- 14.17 All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- 14.18 a. The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

Permittee: The Amalgamated Sugar Company, LLC
Location: Paul, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

14.19 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- i. The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
- i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
- ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to, or at the time, of permit issuance;
- iii. The applicable requirements of the acid rain program, consistent with 42 USC Section 7651(g)(a); and
- iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 3/19/99;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 14.20 a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

Permittee: The Amalgamated Sugar Company, LLC **Date Issued:** December 12, 2002
Location: Paul, Idaho **Date Expires:** December 12, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94;
40 CFR 70.6(c)(3)(4)]

Periodic Compliance Certification

- 14.21 a. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
- b. Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
- c. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- d. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 14.21.d.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
 - iv. Such other facts as the Department may require to determine the compliance status of the source.
 - v. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended,
62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

Permittee: The Amalgamated Sugar Company, LLC
Location: Paul, Idaho

Date Issued: December 12, 2002
Date Expires: December 12, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

False Statements

- 14.22 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

No Tampering

- 14.23 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

- 14.24 In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

- 14.25 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

- 14.26 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

- 14.27 In accordance with IDAPA 58.01.01.332, an emergency as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]

APPENDIX A

The Amalgamated Sugar Company, Paul

Process Weight Input Calculation

Appendix

Pulp Dryer Material Input Rate Calculation

The material input rate is back calculated using the following parameters: tons of dried pulp produced; pressed pulp moisture content (%); dried pulp moisture content (%); fuel input per ton of dried pulp (therms/ton); fuel heating value (BTUs/lb); amount of additives (% dry substance on dried pulp); and solids content of the additives (RDS). This data is inputted into the attached spreadsheet to calculate the material input rate expressed as tons of input per hour. Parameters to calculate the dryer input are collected from the daily reports. The hourly material input rate is calculated by dividing the daily rate by 24. Throughput to each dryer is calculated by either: 1) Measuring the amount of coal inputted into each pulp dryer furnace and calculating the percent input to each dryer; or 2) Assuming the north dryer produces ~54% of the dried pulp and the south dryer produces ~46% of the dried pulp. This material input rate calculation does not account for any pressed pulp burned in the drum.